

Dear FCC, On behalf of consumers residing in 24-northeastern counties in California, we strongly support NECA's recommendations for the VRS rate of \$14.023 to be Endorsed by the FCC as "final." The cost of services tabulated by providers of VRS, averaged out, proved to NECA the necessity of having a higher rate. This rate may not even be high enough for some VRS providers, however, we trust the experts and comments from Sprint, as well as CSD (pioneer and trendsetter of VRS).

Specifically, history has demonstrated whereby new services trends started off with high costs of rates with any Telecommunication products approved for the general public, why should the issue over VRS rates be any different? We fail to understand the FCC's rationale by singling out VRS issue all of a sudden? We feel the FCC has an obligation to disclose its source for doing an off-the wall investigation when it traditionally has not been their place to do so all these years. Where were you when the TTY Relay first began? Costs were higher at the onset, and changed over the years downward. Hence, we are of the opinion that the FCC's concern is weak, and frankly premature. Furthermore, HOVRS's explanation with special mention of the high costs related to astronomically high maintenance of software/upgrades/IT services, and Interpreters fees, are indeed a valid points whereby nonprofit agencies like NorCal are NOT in the VRS business for that very reason!

Until the day interpreters nationally relinquish their demand for the high fees they bill us for (and by which the FCC has no control of, likewise those of us who serve the Deaf population), we are stuck paying these high costs! Point in case, the demand for Interpreters for VRS is an even higher rate due to the special needs and high tech requirements. Therefore, we request that justification for this rate provided to the FCC by such experts be endorsed as valid, and that the NECA's rate aforementioned, be stamped "approved."

Last but not least, our concern still lays with the inaccessibility and violation of several laws should this rate not be corrected. Currently, VRS hours of operations has been reduced, and thus places the FCC in further jeopardy and highly vulnerable to potential lawsuits, should something traumatic happens during the hours when VRS is not in operation. By way of example: a deaf child in Sacramento, California, not being able to use VRS (due to shut down of services at 3am because of the flaws in FCC's low rates) to call 911 because the child's single parent (a deaf mother) just had a heart

attack and died as  
a result. Ultimately, the FCC would be held liable.  
Meanwhile, the clock is ticking...  
Thank you,  
Sheri Farinha Mutti, CEONorCal Center on Deafness, Inc.4708 Roseville Road,  
Suite 112Sacramento, CA 95660Email: Sfmutti@norcalcenter.orgor SFMXO@aol.com

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